

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al,	§
<i>Plaintiffs,</i>	§
	§
	§ Consolidated Case No. 5:21-CV-
v.	§ 0844-XR
	§
GREGORY W. ABBOTT, in his official	§
Capacity as Governor of Texas, et al,	§
<i>Defendants.</i>	§
	§

**NOTICE OF DEFENDANT ISABEL LONGORIA'S
AMENDED INITIAL DISCLOSURES**

Pursuant to this Court's November 12, 2021, Order (Docket No. 96), Defendant Isabel Longoria, in her official capacity as the Harris County Elections Administrator, hereby files her Amended Initial Disclosures on the Court's public docket. Attached as Exhibit 1 is true and correct copy of Defendant Longoria's Amended Initial Disclosures, which undersigned counsel served on counsel for all parties in this case on April 29, 2022.

Dated April 29, 2022

Respectfully submitted,

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*Attorneys for Defendant ISABEL
LONGORIA, in her Official Capacity as
Harris County Elections Administrator*

CERTIFICATE OF SERVICE

I certify that on the 29th day of April, 2022, a true and correct copy of the foregoing document was delivered to all counsel of record via the Court's CM/ECF system and served by electronic notice to all parties of record.

/s/Tiffany S. Bingham
Tiffany s. Bingham

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, in his official capacity as Governor of Texas, et al.,

Defendants.

Consolidated Case No. 5:21-CV-0844-XR

AMENDED INITIAL DISCLOSURES OF DEFENDANT ISABEL LONGORIA, IN HER OFFICIAL CAPACITY AS THE HARRIS COUNTY ELECTIONS ADMINISTRATOR

Defendant ISABEL LONGORIA, in her Official Capacity as the Harris County Elections Administrator,¹ now serves her Amended Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1)-(2).

Rule 26(a)(1)(A)(i): The names and, if known, the address and telephone number of individuals likely to have discoverable information that may be used to support Defendant's claims or defenses are as follows:

Witness Name	Contact Information	Relationship to Case/Subject area of Knowledge	Tier
Isabel Longoria, Harris County Elections Administrator	Contact undersigned counsel	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implementation and impact of SB 1, as well as the administration of elections in Harris County.	1

¹ Isabel Longoria, in her Official Capacity as Harris County Elections Administrator, is named as a defendant in cases 21-cv-780, 21-cv-786, and 21-cv-848, all of which were consolidated into this matter.

John Scott, Secretary of State	Office of Attorney General P.O. Box 12548 (MC-009) Austin, Texas 78711 (512) 463-2100	This witness has knowledge related to the enactment and implementation of SB 1, as well as the State's general responsibilities in elections.	2
Keith Ingram, Director of Elections, Texas Secretary of State	Office of Attorney General P.O. Box 12548 (MC-009) Austin, Texas 78711 (512) 463-2100	This witness has knowledge of the claims and defenses asserted in this lawsuit, and the enactment, interpretation, and implementation and impact of SB 1. This witness oversees responsibilities outlined in Tex. Elec. Code § 31.001(b), § 31.004 for the State, and has knowledge of compliance with and enforcement of State election laws.	1
Warren Kenneth Paxton, Attorney General of Texas	Office of Attorney General P.O. Box 12548 (MC-009) Austin, Texas 78711 (512) 463-2100	This witness has knowledge of the claims and defenses asserted in this lawsuit and enforcement of election laws in Texas, including provisions of SB 1.	2
Gregory W. Abbott, Governor of Texas	Office of Attorney General P.O. Box 12548 (MC-009) Austin, Texas 78711 (512) 463-2100	This witness has knowledge related to the related to the passage, implementation, and enforcement of SB 1.	2
Jose A. Esparza, Deputy Secretary of State	Office of Attorney General P.O. Box 12548 (MC-009) Austin, Texas 78711	This witness has knowledge related to the administration of elections in Texas, and	2

	(512) 463-2100	the passage, implementation, and enforcement of SB 1.	
Dana DeBeauvoir Travis County Clerk	5501 Airport Blvd Austin, Texas 78752 c/o Travis County Attorney's Office P.O. Box 1748 Austin, Texas 78767	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implementation and impact of SB 1, as well as the administration of elections in Travis County.	1
Bridgette Escobedo Travis County Clerk's Office Elections Division Director	5501 Airport Blvd Austin, Texas 78752 c/o Travis County Attorney's Office P.O. Box 1748 Austin, Texas 78767	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implementation and impact of SB 1, as well as the administration of elections in Travis County.	1
Jonathan White Office of Attorney General	300 W. 15 th Street Austin, Texas 78701 (512) 463-2100	This witness has knowledge related to the passage and enforcement of SB 1.	2
Lupe C. Torres Medina County Elections Office	1300 Avenue M, Hondo, TX 78861. (830) 741-6009	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implementation and impact of SB 1, as well as the administration of elections in Medina County.	1
Jacque Callanen Bexar County District Attorney's Office	101 W. Nueva, San Antonio, TX 78205. (210) 335-2146	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implementation and impact of SB 1, as well as the administration of elections in Bexar County.	1

Yvonne Ramón Hidalgo County District Attorney's Office	100 E. Cano, Hidalgo County Courthouse Annex III, Edinburg, TX 78539. (956) 292- 7609	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implementation and impact of SB 1, as well as the administration of elections in Hidalgo County.	1
Michael Scarpello Dallas County District Attorney's Office	500 Elm Street, Suite 6300, Dallas, TX 75202. (214) 653- 7358	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implementation and impact of SB 1, as well as the administration of elections in Dallas County.	1
Lisa Wise, El Paso County Elections Department	500 E. San Antonio Ave., El Paso, TX 79901. (915)546-2154	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implementation and impact of SB 1, as well as the administration of elections in El Paso County.	1
Cathy Cranston, c/o Disability Rights Texas	2222 W. Braker Lane, Austin, TX 78758. (512) 454- 4816	This witness has knowledge regarding voter assistance and the impact of SB 1 on voter assistance.	1
Nancy Crowther	2102 Lewood Circle, Austin, TX 78745- 3534. (512) 808-7486	This witness has knowledge regarding voter assistance and the impact of SB 1 on voter assistance	1

LULAC Texas	c/o Counsel for Plaintiff Law Office of Domingo Garcia PC 1111 West Mockingbird Lane, Suite 1200 Dallas, Texas 75247 (214) 941-8300 Luis Roberto Vera, Jr. Attorney and Counselor at Law 407 West Ware Boulevard San Antonio, Texas 78221 (210) 225-3300	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.1.	1
VOTO LATINO	c/o Counsel for Plaintiff John R. Hardin Perkins Coie LLP 500 North Akard Street, Suite 3300 Dallas, Texas 75201 (214) 965-7700 Marc E. Elias Uzoma N. Nkwonta Joseph N. Posimato Meaghan E. Mixon Elias Law Group LLP 10 G Street NE, Suite 600 Washington, D.C. 20002 (202) 968-4490 Jonathan P. Hawley Elias Law Group LLP 1700 Seventh Ave, Suite 2100 Seattle, WA 98101 (206) 656-0179	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1

Texas Alliance for Retired Americans	<p>c/o Counsel for Plaintiff</p> <p>John R. Hardin Perkins Coie LLP 500 North Akard Street, Suite 3300 Dallas, Texas 75201 (214) 965-7700</p> <p>Marc E. Elias Uzoma N. Nkwonta Joseph N. Posimato Meaghan E. Mixon Elias Law Group LLP 10 G Street NE, Suite 600 Washington, D.C. 20002 (202) 968-4490</p> <p>Jonathan P. Hawley Elias Law Group LLP 1700 Seventh Ave, Suite 2100 Seattle, WA 98101 (206) 656-0179</p>	<p>This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.</p>	1
Texas AFT	<p>c/o Counsel for Plaintiff</p> <p>John R. Hardin Perkins Coie LLP 500 North Akard Street, Suite 3300 Dallas, Texas 75201 (214) 965-7700</p> <p>Marc E. Elias Uzoma N. Nkwonta Joseph N. Posimato Meaghan E. Mixon Elias Law Group LLP 10 G Street NE, Suite 600 Washington, D.C. 20002</p>	<p>This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.</p>	1

	(202) 968-4490 Jonathan P. Hawley Elias Law Group LLP 1700 Seventh Ave, Suite 2100 Seattle, WA 98101 (206) 656-0179		
OCA Greater Houston	c/o Attorneys for Consolidated Plaintiffs Samantha Osaki Sophia L Lakin Adriel Cepeda-Derieux American Civil Liberties Union Foundation 125 Broad Street, 18th Floor, New York, NY 10004 Savannah Kumar American Civil Liberties Union Foundation of Texas PO Box 8306, Houston, TX 77288 Jerry Vattamal Asian American Legal Defense and Education Fund 99 Hudson Street, 12th Floor, New York, NY 10013 Zachary Dolling Texas Civil Right Project 2911 N. Main Ave., San Antonio, TX 78212	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1
League of Women Voters of Texas	c/o Counsel for Plaintiff Samantha Osaki Sophia L Lakin Adriel Cepeda-Derieux	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1

	<p>American Civil Liberties Union Foundation 125 Broad Street, 18th Floor, New York, NY 10004</p> <p>Savannah Kumar American Civil Liberties Union Foundation of Texas PO Box 8306, Houston, TX 77288</p> <p>Jerry Vattamal Asian American Legal Defense and Education Fund 99 Hudson Street, 12th Floor, New York, NY 10013</p> <p>Zachary Dolling Texas Civil Right Project 2911 N. Main Ave., San Antonio, TX 78212</p>		
Revup-Texas	<p>c/o Counsel for Plaintiff</p> <p>Samantha Osaki Sophia L Lakin Adriel Cepeda-Derieux American Civil Liberties Union Foundation 125 Broad Street, 18th Floor, New York, NY 10004</p> <p>Savannah Kumar American Civil Liberties Union Foundation of Texas</p>	<p>This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.</p>	1

	<p>PO Box 8306, Houston, TX 77288</p> <p>Jerry Vattamal Asian American Legal Defense and Education Fund 99 Hudson Street, 12th Floor, New York, NY 10013</p> <p>Zachary Dolling Texas Civil Right Project 2911 N. Main Ave., San Antonio, TX 78212</p>		
Texas Organizing Project	<p>c/o Counsel for Plaintiff</p> <p>Samantha Osaki Sophia L Lakin Adriel Cepeda-Derieux American Civil Liberties Union Foundation 125 Broad Street, 18th Floor, New York, NY 10004</p> <p>Savannah Kumar American Civil Liberties Union Foundation of Texas PO Box 8306, Houston, TX 77288</p> <p>Jerry Vattamal Asian American Legal Defense and Education Fund 99 Hudson Street, 12th Floor, New York, NY 10013</p> <p>Zachary Dolling Texas Civil Right Project</p>	<p>This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.</p>	1

	2911 N. Main Ave., San Antonio, TX 78212		
Workers Defense Action Fund	c/o Counsel for Plaintiff Samantha Osaki Sophia L Lakin Adriel Cepeda-Derieux American Civil Liberties Union Foundation 125 Broad Street, 18th Floor, New York, NY 10004 Savannah Kumar American Civil Liberties Union Foundation of Texas PO Box 8306, Houston, TX 77288 Jerry Vattamal Asian American Legal Defense and Education Fund 99 Hudson Street, 12th Floor, New York, NY 10013 Zachary Dolling Texas Civil Right Project 2911 N. Main Ave., San Antonio, TX 78212	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1
Rebecca Guerrero Travis County Clerk	5501 Airport Blvd Austin, Texas 78752 c/o Travis County Attorney's Office P.O. Box 1748 Austin, Texas 78767	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implementation and impact of SB 1, as well as the administration of	1

		elections in Travis County.	
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Isabel Longoria reserves the right to supplement her list of persons with knowledge in the future as discovery is ongoing in this case. Defendant further reserves the right to call any person identified by any party or deposed in this lawsuit as a witness at trial.

Rule 26(a)(1)(A)(ii): A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

The text and legislative history of SB 1.

Isabel Longoria is also in possession of documents related to the administration of elections in Harris County, including documents related to mail-in voting, voter registration, voting records, and elections generally in Harris County.

Isabel Longoria is also in possession of documents related to internal election policies and procedures and any guidance that may have been received from the Texas Secretary of State.

Isabel Longoria reserves the right to supplement her category of documents in the future as discovery is ongoing in this case. Defendant further reserves the right to use any document identified by and/or produced by any party in this this lawsuit.

Rule 26(a)(1)(A)(iii): A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Isabel Longoria does not seek damages.

Rule 26(a)(1)(A)(iv): For inspection and copying as under Rule 34 any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Isabel Longoria does not have responsive documents.

Rule 26(a)(2)(C): Expert Testimony

These witnesses are attorneys in the Harris County Attorney's Office and may offer testimony regarding the necessity and reasonableness of attorneys' fees.

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Dated April 29, 2022

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